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10 *APPLE INC.*

11
12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 CORONAVIRUS REPORTER, CALID INC.,
16 PRIMARY PRODUCTIONS LLC, DR.
17 JEFFREY D. ISAACS, on behalf of themselves
18 and all others similarly situated

19 Plaintiffs,

20 v.

21 APPLE INC., FEDERAL TRADE
22 COMMISSION

23 Defendants.
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CASE NO. 3:21-CV-05567-EMC

**DECLARATION OF JULIAN W.
KLEINBRODT IN SUPPORT OF
DEFENDANT APPLE INC.'S OPPOSITION
TO PLAINTIFF JEFFREY ISAACS'
MOTION FOR RELIEF FROM JUDGMENT**

Judge: Hon. Edward M. Chen

1 I hereby declare as follows:

2 1. I am an attorney licensed to practice in the State of California and before this Court. I
3 am a partner at the law firm Gibson, Dunn & Crutcher LLP, and counsel of record for Defendant Apple
4 Inc. ("Apple") in this case. I submit this declaration in support of Apple's Opposition to Plaintiff
5 Jeffrey Isaacs' Motion for Relief from Judgment.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of the docket for Supreme Court
7 of the United States Docket No. 23A718, which was downloaded from the Supreme Court's official
8 website on April 22, 2024. The specific webpage is publicly available at
9 <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/23a718.html#>.

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of the docket for Supreme Court
11 of the United States Docket No. 23-1089, which was downloaded from the Supreme Court's official
12 website on April 22, 2024. The specific webpage is publicly available at
13 <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/23-1089.html#>.

14 4. Attached hereto as **Exhibit 3** is a true and correct copy of the petition for certiorari filed
15 by Jeffrey Isaacs in *Isaacs v. USC Keck School of Medicine, et al.*, Docket No. 21-592, which was
16 downloaded from the Supreme Court's official website on April 24, 2024. The specific webpage is
17 publicly available at
18 <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/21-592.html>.

19 5. Attached hereto as **Exhibit 4** is a true and correct copy of an email chain between Jeffrey
20 Isaacs, his attorney, and myself originating on April 15, 2024 regarding Jeffrey Isaacs' further attempts
21 to propound discovery.

22
23 DATED: April 26, 2024

GIBSON, DUNN & CRUTCHER LLP

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25 By: /s/ Julian W. Kleinbrodt
26 Julian W. Kleinbrodt

27 *Attorney for Defendant Apple Inc.*